

UNITED STATES DISTRICT COURT

for the

Central District of California

David Hough, et al. (See Attachment A)

Plaintiff(s)

v.

Ryan Carroll, et al. (See Attachment B)

Defendant(s)

Civil Action No. 2:24-cv-02886

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* See Attachment B

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Attorney for Plaintiffs: Nico Banks. Address: 712 H St. NE, Unit 8571, Washington, DC 20002. Tel.: 971-678-0036

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

B. Moss

Signature of Clerk or Deputy Clerk



Date: 5/22/2024

ATTACHMENT A

Nico Banks, Esq.
nico@bankslawoffice.com
Filing on behalf of all Plaintiffs
CA Bar No. 344705
Banks Law Office
712 H St NE,
Unit #8571,
Washington, DC 20002
Tel.: 971-678-0036

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH;) Case No.: 2:24-cv-02886-WLH
AMUND THOMPSON;)
ISABEL RAMOS;) FIRST AMENDED COMPLAINT
ANTHONY RAMOS;) FOR:
MICHAEL NIBARGER) 1. FRAUD CONSPIRACY
) 2. AIDING AND ABETTING
Plaintiffs,) FRAUD
vs.) 3. FRAUDULENT TRANSFERS
) IN FURTHERANCE OF
RYAN CARROLL;) CONSPIRACY
MAX K. DAY;) CLASS ACTION
MAX O. DAY;)
MICHAEL DAY;)
JARED DAY;) DEMAND FOR JURY TRIAL
MATTHEW CROUCH;)
CHRISTINE CARROLL;)
TROY MARCHAND;)
BONNIE NICHOLS;)
TRAVIS MARKER;)
REYHAN PASINLI;)
YAX ECOMMERCE LLC; PRECISION)
TRADING GROUP, LLC;)
WA DISTRIBUTION LLC;)
PROVIDENCE OAK PROPERTIES,)
LLC;)
WA AMAZON SELLER LLC;)

1 YAX IP AND MANAGEMENT INC.
(D.B.A. “FULFILLABLE”);
2 MKD INVESTMENT ADVISOR, LLC;
3 MKD FAMILY BENEFICIARY, LLC;
MKD FAMILY PRIVATE
4 MANAGEMENT COMPANY, LLC;
5 MAX DAY CONSULTING, LLC;
HOUTEX FARM EQUITY PARTNERS
6 LLC;
7 BUSINESS FINANCIAL SOLUTIONS
ADVISORY LLC;
8 EVO MAXX LLC;
9 WWKB LLC;
DREAMS TO REALITY LLC;
10 QUANTUM ECOMMERCE, LLC;
11 WHOLESALE UNIVERSE, INC.;
THE LAW OFFICE OF TRAVIS R.
12 MARKER, A PROFESSIONAL
13 CORPORATION (D.B.A. “MARKER
LAW AND MEDIATION”);
14 PARLAY LAW GROUP A
15 PROFESSIONAL CORPORATION;
TOTAL-APPS, INC.;
16 WELLS FARGO BANK, N.A.

17
18 Defendants.

19 **FIRST AMENDED COMPLAINT — CLASS ACTION**

20 Plaintiffs David Hough, Amund Thompson, Isabel Ramos and Anthony
21 Ramos, and Michael Nibarger (collectively, “Plaintiffs” or “Class Representatives”),
22 individually and on behalf of others similarly situated, by and through their attorneys,
23 bring this class action complaint against the following Defendants: (1) Ryan Carroll;
24 Max K. Day; Max O. Day; Michael Day; Jared Day; Matthew Crouch; Christine
25 Carroll; Troy Marchand; Bonnie Nichols; Travis Marker; and Reyhan Pasinli
26
27
28

ATTACHMENT B

ATTACHMENT #2 TO SUMMONS

DEFENDANTS TO BE SERVED:

RYAN CARROLL;
2900 NE 7th Ave,
Unit 2502,
Miami, Florida 33137

MAX K. DAY;
18210 Farnsfield Drive,
Houston, Texas 77084

MAX O. DAY;
3118 Brandon Hill Lane,
Sugar Land, Texas 77479

MICHAEL DAY;
25010 Ginger Ranch Drive,
Katy, Texas 77494

JARED DAY;
19710 Chara Ct,
Cypress, TX 77433

MATTHEW CROUCH;
9566 Greiner Rd,
Clarence, NY 14031

CHRISTINE CARROLL;
11298 Snow View Ct,
Yucaipa, CA 92399

TROY MARCHAND;
13350 Alston Dr.,
Fishers, IN, 46037

BONNIE NICHOLS;
2835 E Cotton St.
Ste. C
Longview, TX 75602

TRAVIS MARKER;
333 2nd St.
Suite 16,
Ogden, UT, 84404

REYHAN PASINLI;
26800 Aliso Viejo Pkwy
Ste 130,
Aliso Viejo, Ca 92656

YAX ECOMMERCE LLC;
2900 NE
7th Ave, Unit 2502,
Miami, Florida 33137

PRECISION TRADING GROUP, LLC;
18210 Farnsfield Drive,
Houston, Texas 77084;

WA DISTRIBUTION LLC;
2900 NE
7th Ave, Unit 2502,
Miami, Florida 33137

PROVIDENCE OAK PROPERTIES, LLC;
18210 Farnsfield Drive,
Houston, Texas 77084;

WA AMAZON SELLER LLC;
2900 NE
7th Ave, Unit 2502,
Miami, Florida 33137

YAX IP AND MANAGEMENT INC.;
P.O. Box 1505
Austin, TX 78767

MKD INVESTMENT ADVISOR, LLC;
18210 Farnsfield Drive,
Houston, Texas 77084;

MKD FAMILY BENEFICIARY, LLC;
18210 Farnsfield Drive,
Houston, Texas 77084;

MKD FAMILY PRIVATE MANAGEMENT COMPANY, LLC;
18210 Farnsfield Drive,
Houston, Texas 77084;

MAX DAY CONSULTING, LLC;
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Houston, Texas 77084;

HOUTEX FARM EQUITY PARTNERS LLC;
18210 Farnsfield Drive,
Houston, Texas 77084;

BUSINESS FINANCIAL SOLUTIONS ADVISORY LLC;
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Houston, Texas 77084;

EVO MAXX LLC;
18210 Farnsfield Drive,
Houston, Texas 77084;

WWKB LLC
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Longview, TX 75602

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333 2nd St.
Suite 16,
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PARLAY LAW GROUP A PROFESSIONAL CORPORATION
333 2nd St.
Suite 16,
Ogden, UT, 84404

TOTAL-APPS, INC.
c/o Aaron C. Watts
23986 Aliso Creek Rd.,
#707
Laguna Niguel, CA 92677

WELLS FARGO BANK, N.A.
350 N. St. Paul Street,
Dallas, TX, 75201